

# OPERATIONAL QUALITY ASSURANCE PROGRAM DESCRIPTION (EN-QA-004)

APPROVED:

  
\_\_\_\_\_  
Manager, Quality

10/8/99  
Date Effective

REVISION NO. 32

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**ENERGY**  
**NORTHWEST**

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MANAGEMENT STATEMENT

It is the policy of Energy Northwest to design, construct and operate its nuclear power plant without undue risk to the health and safety of the public and to the environment. In support of this policy, Energy Northwest has established a Quality Assurance Program that is described in the following two documents:

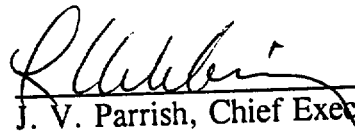
1. Quality Assurance Program for Design and Construction
2. Operational Quality Assurance Program Description (Operations Phase)

These two documents contain the official Energy Northwest Quality Assurance policies. All Energy Northwest employees shall adhere to these policies.

The Operational Quality Assurance Program Description meets the applicable requirements of 10 CFR 50, Appendix B.

The Quality Department is mandated the responsibility and authority for establishing, administering, and assuring implementation of the Energy Northwest Quality Assurance Program. The Manager, Quality has the responsibility and authority, including stop work authority, to perform actions necessary to accomplish this mandate as delineated in the Quality Assurance Program manuals and documents.

The Quality Department has my delegated approval authority for the Operational Quality Assurance Program Description and any necessary modifications.

 10/8/99  
 J. V. Parrish, Chief Executive Officer/Date

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## 1.0 SECTION 1 - ORGANIZATION

### 1.1 Management

#### 1.1.1 Methodology

- a. The Operational Quality Assurance Program Description (OQAPD) provides a consolidated overview of the quality program controls which govern the operation and maintenance of Energy Northwest's quality related items and activities. The OQAPD describes the quality assurance organizational structure, functional responsibilities, levels of authority, and interfaces.
- b. The requirements and commitments contained in the OQAPD are mandatory and must be implemented, enforced, and adhered to by all individuals and organizations. Employees are encouraged to actively participate in the continued development of the OQAPD as well as its implementation. Proposed changes should be promptly communicated when identified.
- c. The OQAPD applies to all activities associated with structures, systems, and components which are safety related or controlled by 10 CFR 72. The OQAPD also applies to transportation packages controlled by 10 CFR 71. The methods of implementation of the requirements of the OQAPD are commensurate with the item's or activity's importance to safety. The applicability of the requirements of the OQAPD to other items and activities is determined on a case-by-case basis. The OQAPD implements 10 CFR 50 Appendix B, 10 CFR 71 Subpart H, and 10 CFR 72 Subpart G.
- d. The OQAPD is implemented through the use of approved procedures (i.e., policies, directives, procedures, instructions, or other documents) which provide written guidance for the control of quality-related activities and provide for the development of documentation to provide objective evidence of compliance.

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### 1.1.2 Organization

The organizational structure responsible for implementation of the OQAPD is described below. The specific organization titles for the quality assurance functions described are identified in procedures. The authority to accomplish the quality assurance functions described is delegated to the incumbent's staff as necessary to fulfill the identified responsibility.

- a. The Chief Executive Officer is responsible for providing top level direction of all activities associated with the safe and reliable operation of Energy Northwest's nuclear site. The Chief Executive Officer as the Chief Nuclear Officer provides guidance with regards to plant nuclear safety and company quality assurance policy.
- b. The following executives report to the chief executive officer:
  - 1) The executive responsible for plant nuclear safety and efficient operation of WNP-2 is responsible for establishing policies, goals and objectives, implementing the quality assurance program and overseeing of the on-site safety review committee.
  - 2) The executive responsible for operations support is responsible for establishing policies, goals and objectives that support the safe and efficient operation of WNP-2, implementing the quality assurance program, maintaining the OQAPD in accordance with regulatory requirements, and overseeing the activities associated with the off-site safety review committee.

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- c. The individuals fulfilling the following management functions report to the executives identified above. These individuals may report through other layers of management, but shall maintain sufficient authority and organizational freedom to implement the assigned responsibilities.
- 1) The manager responsible for quality assurance has overall authority and responsibility for establishing, controlling, and verifying the implementation and adequacy of the quality assurance program as described in this OQAPD including stopping unsatisfactory work. The manager responsible for quality assurance has the authority and responsibility to escalate matters directly to the chief executive officer when needed.
  - 2) The manager responsible for overall plant operations assures the safe, reliable, and efficient operation of the plant within the constraints of applicable regulatory requirements and the operating license. The functional responsibilities include the following:
    - Chemistry
    - Operations
    - Maintenance
    - Radiological Protection
    - Plant and Systems Engineering
    - Work Control
    - Tests
    - On-Site Safety Review Committee
    - Maintenance of the plant in conformance with approved design
  - 3) The manager responsible for training provides direction, control, and overall supervision of all training of personnel required by regulations.

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- 4) The manager responsible for records management provides direction, control, and overall supervision of the records management program and associated activities.
  - 5) The manager responsible for the corrective action program provides direction, control, and overall supervision of the corrective action program and associated activities.
  - 6) The manager responsible for engineering is responsible for the development and maintenance of engineering programs, policies, and procedures and for providing engineering services. Different aspects of these responsibilities (e.g., system engineering) may be fulfilled by separate managers.
  - 7) The manager responsible for materials, purchasing, and contracts is responsible for procurement, services, receipt, storage, and issue of materials, parts, and components.
- d. The on-site and off-site safety review committees independently review activities to provide additional assurance that WNP-2 is operated and maintained in accordance with the Operating License and applicable regulations which address nuclear safety. These responsibilities are outlined in Appendix III.

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## 2.0 SECTION 2 - QUALITY ASSURANCE (QA) PROGRAM

### 2.1 PURPOSE

This section provides an overall description of the QA Program that will be applied to initial testing and subsequent operation and maintenance activities throughout the life of the Energy Northwest nuclear power plant.

### 2.2 GENERAL

- 2.2.1 The QA Program will be implemented through a series of Site Wide Procedures (SWP), plant procedures contained in the Plant Procedure Manual, and Nuclear Operating Standards (NOS) contained in the Functional Manual for Nuclear Operation. The procedures and standards prescribe detailed methods for functional accomplishment. The procedures and standards will address the applicable requirements of Appendix B to 10 CFR 50 included in Tables 2-1 and 2-2. The procedures and standards will comply with the regulatory positions of QA-related Regulatory Guides as identified and modified in Appendix II, Position Statements and the additional Quality Program requirements as identified in Appendix III.
- 2.2.2 A list of safety-related items that will be subject to the applicable controls of the QA Program is included in the Final Safety Analysis Report (FSAR) for the applicable Energy Northwest nuclear power plant. Changes to this listing shall be controlled by the Engineering Manager and approved by the Plant General Manager.
- 2.2.3 Applicable provisions of the QA Program shall be implemented by the earliest of the following and shall remain in effect for the life of the Energy Northwest nuclear power plant:
- a. Prior to inception of the activity.
  - b. At the time of temporary/permanent transfer of system/component custody to Test and Startup organization.
  - c. Ninety (90) days prior to initial fuel loading.

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2.2.4 Revision to the QA Program will be made by the Quality organization as follows:

- a. Proposed changes to the QA Program will be evaluated to determine whether or not they would result in a reduction of commitments previously accepted by the Nuclear Regulatory Commission (NRC).
- b. Changes that do not reduce the commitments may be implemented prior to forwarding such changes to the NRC. However, all such changes shall be forwarded to the NRC at least annually.
- c. Changes that reduce commitments will be forwarded to the NRC for its review and acceptance prior to implementation. Such changes shall be regarded as accepted by the NRC upon receipt of a letter from the NRC to this effect or sixty (60) days after submittal to the NRC, whichever occurs first.

2.2.5 Managers of Energy Northwest organizations responsible for implementing the applicable provisions of the QA Program shall assure that activities that affect safety-related functions of plant items are performed by personnel who have been indoctrinated and trained. The scope, objective, and method of implementing the indoctrination and training program shall be documented. Proficiency of personnel performing activities that affect safety-related functions of plant items shall be maintained by retraining, re-examining, and/or recertifying, as applicable. Methods shall be provided for documenting training.

2.2.6 The scope, implementation, and effectiveness of the QA Program is routinely audited by the Quality organization. Copies of audit reports are presented to Energy Northwest management to provide for assessment of the effectiveness of the QA Program. Additionally, at least once per two (2) years, Energy Northwest management arranges for an independent evaluation of the adequacy of the scope, implementation, and effectiveness of the QA Program. This is accomplished by knowledgeable personnel outside of the Quality organization to assure achievement of an objective program assessment. Results of these independent evaluations are reported to the Chief Executive Officer, the executive responsible for Nuclear Safety and Plant Operations, and the executive responsible for Operations Support.

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### 2.2.7 Regulatory Commitments

Except where alternatives are identified, Energy Northwest complies with the QA guidance documents listed on Appendix II. If the guidance in one of these documents is in conflict with the OQAPD, the guidance provided in the OQAPD is the controlling guidance. Additionally, the following clarifications apply to all guidance documents listed in Appendix II:

- a. For modifications and non-routine maintenance, guidance applicable to construction-like activities is applicable to comparable plant activities. The inspection of modifications, repairs, rework, and replacements shall be in accordance with the original design and inspection requirements or a documented approved alternative.
- b. The definitions provided by Regulatory Guide 1.74 and associated clarifications, as described in Appendix II, apply wherever the defined term is used in the OQAPD and associated guidance documents.
- c. Clarification to a guidance document applies wherever the guidance document is invoked.
- d. In each of the ANSI standards, other documents (e.g., standards, codes, regulations, tables, or appendices) are referenced or described. These other documents are only quality assurance program requirements if explicitly committed to in the OQAPD. If not explicitly committed to, these documents are not considered as quality assurance program requirements, although they may be used as guidance.
- e. Guidance applicable to safety-related items and activities is applicable to comparable items and activities controlled by 10 CFR 72 and transportation packages controlled by 10 CFR 71.
- f. Scheduling latitude of 25 percent, or 90 days, whichever is shorter may be applied to performance of periodic activities (annual supplier evaluations, triennial vendor audits, recertification in accordance with ANSI N45.2.23-1978 (QA Program Audit Personnel), Annual Evaluations in accordance with ANSI N54.2.6-1979 (Qualifications of Inspection, Examination, & Testing Personnel), and internal audits in accordance with ANSI N18.7-1972.

# **OPERATIONAL QUALITY ASSURANCE PROGRAM DESCRIPTION**

**TABLE 2-1**

**OPERATIONAL QA PROGRAM DESCRIPTION  
IMPLEMENTING NUCLEAR OPERATION STANDARDS  
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Nuclear Operation Standards		10CFR50 Appendix B Criterion																	
Number	Title	1	2	3	4	5	6	7	8	9	10	11	12	13	14	15	16	17	18
NOS-1	Organizational Responsibilities, Changes	X																	
NOS-2	Control of the Functional Manual for Nuclear Operation	X				X	X												
NOS-3	Operational QA Program Description Control	X					X												
NOS-4	Plant Operations and Maintenance Control	X		X			X		X	X			X	X	X				
NOS-5	Personnel Training, Qualification and Certification	X	X								X								
NOS-6	Review Committees (CNSRB & POC)	X																	
NOS-8	Nuclear Safety Assurance Assessment Program	X																	
NOS-9	Procedures/Instructions Control	X		X		X	X												
NOS-11	Conduct of Licensing Activities	X					X												
NOS-13	Reporting of Incidents	X		X															
NOS-14	Operating Experience Review	X																	
NOS-19	Plant QC Inspection Program	X									X	X							
NOS-20	Quality Assurance Evaluations	X														X	X		X
NOS-21	ASME Pressure Boundary Work	X		X			X	X	X	X	X	X		X	X				
NOS-22	Q-List Control	X		X															
NOS-23	Plant Modification Control	X		X		X					X								
NOS-24	Control of Records	X																X	
NOS-26	Computer Software QA	X		X		X													
NOS-27	Procurement and Storage Control	X			X		X	X						X					
NOS-30	Control of Nonconformances and Corrective Action	X		X			X								X	X	X		
NOS-32	Configuration Management Program	X		X			X												
NOS-33	Inservice Inspections	X					X			X	X	X							
NOS-34	Inservice Testing of Pumps and Valves	X					X				X								
NOS-35	Nuclear Materials Control	X													X				
NOS-36	Chemistry	X													X				
NOS-37	Rad. Environmental Mon. Program	X													X				
NOS-39	Fire Protection Program	X													X				
NOS-41	QA Program for Radioactive Materials Shipping Packages	X																	
NOS-45	Simulator Certification	X	X	X			X					X			X				

# OPERATIONAL QUALITY ASSURANCE PROGRAM DESCRIPTION

TABLE 2-2  
OPERATIONAL QA PROGRAM DESCRIPTION  
IMPLEMENTING SITE WIDE PROCEDURES  
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Site Wide Procedures		10CFR50 Appendix B Criterion																	
Number	Title	1	2	3	4	5	6	7	8	9	10	11	12	13	14	15	16	17	18
SWP-PRO-01	Procedure/Instruction Use	X		X		X	X												
SWP-PRO-2	Prep./Review/Approval of Procedures	X		X		X	X												
SWP-PRO-03	Procedure Writer's Manual					X													
SWP-PUR-01	Procurement of Services	X			X		X	X						X					
SWP-PUR-03	Restricted Use Equipment List (RUEL)				X			X											
SWP-PUR-05	Emergency Purchasing				X			X											
SWP-PUR-02	Procurement Technical Reviews	X		X															
SWP-PUR-04	Material Equipment Parts, and Supplies Procurement	X		X	X	X			X				X	X					X
SWP-MMP-01	Control of Ageable Items													X					
SWP-MMP-02	Warehousing							X						X					
SWP-MMP-03	Packaging and Shipping of Material and Equipment							X						X					
SWP-ASU-01	Evaluations of Programs, Processes and Suppliers	X														X	X		X
SWP-FPP-01	Nuclear Fire Protection Program	X	X	X	X	X		X			X	X			X	X	X	X	X
SWP-IRP-01	Plant Operations Committee	X																	
SWP-IRP-02	Corporate Nuclear Safety Review Board	X																	X
SWP-DOC-01	Document Control					X	X												
SWP-EPP-01	Emergency Response Organization and Training	X	X																
SWP-MAI-01	Work Management Planning Scheduling and Work Activities	X				X	X				X	X				X	X		
SWP-OPS-03	Plant Clearance Orders	X													X				
SWP-REC-01	Records Management	X																X	
SWP-RMP-02	Radiation Waste Process Control Program	X	X														X	X	
SWP-TQS-01	Training, Qualification and Simulators	X	X								X								
SWP-CSW-01	Software QA Program	X		X			X												
SWP-CSW-02	WNP-2 Software Control	X		X			X												
SWP-INS-01	Quality Control Inspection and Peer Verification	X							X	X									

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**TABLE 2-2**  
**OPERATIONAL QA PROGRAM DESCRIPTION**  
**IMPLEMENTING SITE WIDE PROCEDURES**  
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### 3.0 SECTION 3 - DESIGN CONTROL

#### 3.1 PURPOSE

This section sets forth requirements for the control of new designs, changes thereto, and plant modifications that affect safety-related functions of structures, systems, and components.

#### 3.2 GENERAL

3.2.1 Organizations (both internal and external) participating in the preparation, review, approval, and verification of design documents (drawings, design input and criteria, specifications, design analysis, computer programs, system descriptions, procedures, and instructions) associated with new designs, changes thereto, and plant modifications shall develop and implement procedures that clearly delineate actions to be accomplished. These procedures shall contain provisions to assure that:

- a. Applicable regulatory requirements and design bases specified in the Final Safety Analysis Report are correctly translated into design documents.
- b. Appropriate quality standards are specified and included in design documents and that changes from such standards are documented, approved, and controlled.
- c. Design analysis (reactor physics, stress, thermal, hydraulic, accident, etc.) is performed, where applicable.
- d. Items such as compatibility of materials, parts, components, and processes selected; accessibility for inservice inspection, maintenance, and repair; and delineation of acceptance criteria for inspections and tests are considered, where applicable, during the design development and review phases.
- e. Errors and deficiencies discovered in approved design documents that could adversely affect safety-related structures, systems, and components are documented and that appropriate corrective action is taken.

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- f. Development, maintenance, and use of computer code programs is controlled. Where the use of a particular computer code for performing design calculations is specified, such computer code is verified and certified for use.

3.2.2 Where two or more design organizations are involved in the performance of design, necessary interface controls (both internal and external) shall be documented and controlled between the participating organizations, particularly in the area of review, approval, release, distribution and revision of interface documents.

3.2.3 Design verification, to provide assurance that the design meets the specified design inputs, shall be performed by utilizing methods such as design reviews, alternate calculations, or qualification testing.

3.2.4 Design verification procedures shall be established and implemented. These procedures shall:

- a. Provide for the determination of the method for design verification that will be utilized.
- b. Provide assurance that the design verification is performed and documented by personnel other than those who performed the original design but who may be from the same organization.
- c. Identify the responsibilities of the verifier; areas, features, and pertinent considerations to be verified; and the documentation to be generated.
- d. Require that where verification method is only by test, the prototype, component, or feature testing is performed at the earliest practicable stage and under the most adverse design conditions.
- e. Require the accomplishment of design verification, in all cases, prior to relying upon the item to perform its safety function.

3.2.5 Design documents shall be reviewed for adequacy by the originating organization unless delegated to another qualified organization. Such reviews shall be documented and maintained on file.

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- 3.2.6 Changes to approved design documents shall be subjected to design control measures comparable with those that were applied to the original design and shall be approved by the same organization that approved the original design, unless delegated to another qualified organization, as applicable.
- 3.2.7 Measures shall be established to assure that plant personnel and other affected organizations are made aware of design changes/modifications that affect the performance of their duties.

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#### 4.0 SECTION 4 - PROCURMENT DOCUMENT CONTROL

##### 4.1 PURPOSE

This section sets forth requirements for preparation, review, and approval of procurement documents and changes thereto in order to control the quality of vendor furnished safety-related plant items and services.

##### 4.2 GENERAL

- 4.2.1 Procedures/instructions shall be established and implemented to control procurement-related activities such as procurement planning; preparation, review, approval and control of procurement documents; vendor selection; bid evaluations; and review and concurrence of vendor's quality assurance programs. These procedures/instructions shall clearly delineate the sequence of actions to be accomplished in the preparation, review, and approval of procurement-related documents and shall identify those positions or groups responsible for performing those actions.
- 4.2.2 Procurement documents for items (other than commercial grade off-the-shelf items, as defined in 10CFR21) and for services shall require, where necessary, vendors or subvendors to have a quality assurance program consistent with the applicable provisions of the QA Program.
- 4.2.3 As deemed necessary, the procurement documents will provide for right of access to the vendor's facilities and records for source inspections/audit by Energy Northwest or its designee.
- 4.2.4 Procurement documents shall contain or reference applicable technical requirements (such as regulations, specifications, drawings, codes, and standards), test and inspection requirements, and special process instructions that must be complied with by vendors.
- 4.2.5 Procurement documents shall contain, as applicable, requirements which identify the documentation (such as drawings, specification, inspection and test records, personnel and procedure qualifications, Certificates of Conformance or equivalent certifications, and material chemical and physical test results) to be prepared, maintained, submitted, or made available to Energy Northwest for review and/or approval.

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- 4.2.6 Procurement documents shall be reviewed by independent Procurement personnel. This review will be performed and documented to assure that quality requirements are correctly stated; that they can be inspected and controlled; the vendor is on the current Energy Northwest Evaluated Supplier List; and the procurement documents have been prepared to incorporate appropriate provisions of 4.2.2 through 4.2.5. Quality personnel shall review procurement documents on a sampling basis, either during visits to vendors facilities, or during audits/surveillances, or at receiving inspection.
- 4.2.7 Changes (other than those that are of administrative nature) to approved procurement documents shall be subjected to the same degree of control that was applied during the preparation of original procurement documents.

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## 5.0 SECTION 5 – INSTRUCTIONS, PROCEDURES, AND DRAWINGS

### 5.1 PURPOSE

This section sets forth requirements for instructions, procedures, and drawings for activities that affect safety-related functions of plant items.

### 5.2 GENERAL

- 5.2.1 Activities that affect safety-related functions of plant items shall be described by and accomplished through implementation of documented procedures, instructions or drawings, as appropriate.
- 5.2.2 Procedures/instructions shall be established to assure that procedures, instructions or drawings include appropriate quantitative (such as dimensions, tolerances, and operating limits) or qualitative (such as comparative workmanship samples) acceptance criteria for determining satisfactory work performance and quality compliance.

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QUALITY ASSURANCE PROGRAM DESCRIPTION****6.0 SECTION 6 - DOCUMENT CONTROL****6.1 PURPOSE**

This section sets forth requirements for the control of documents pertaining to activities that affect safety-related functions of plant items.

**6.2 GENERAL**

6.2.1 Procedures shall be established and implemented to control the preparation, review, approval and issuance of documents, including changes thereto, which pertain to activities affecting safety-related functions of plant items. As a minimum, the following types of documents shall be controlled:

- a. Operational QA Program Description.
- b. Energy Northwest Functional Manual for Nuclear Operation.
- c. Design documents (e.g., calculations, drawings, specifications, analyses) including documents related to computer codes.
- d. As-built documents.
- e. Final Safety Analysis Reports.
- f. Procurement documents.
- g. Administrative procedures including Site Wide Procedures which address operations, maintenance, technical specifications, inservice inspection and testing, modification, calibration, testing, nonconformance reports, Final Safety Analysis Report, fuel handling and procurement documents.
- h. Nonconformance reports.

6.2.2 Procedures that control the preparation, review, approval and issuance of documents, including changes thereto, shall contain provisions which provide assurance that:

- a. Type documents listed in paragraph 6.2.1.c through 6.2.1.h are reviewed for technical adequacy, by qualified individuals, prior to approval for release.

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- b. Procedures listed in paragraph 6.2.1.g are reviewed for inclusion of appropriate quality requirements and concurred with by qualified Quality personnel, prior to approval for release.

NOTE: Review and concurrence requirements by Quality personnel will be considered met by Quality participation in the Plant Operating Committee, or by providing dated signatures on the documents reviewed or on documents traceable to the documents reviewed.

- c. Documents are approved for release by authorized personnel prior to implementation.
  - d. Documents are available at the location where the prescribed activity will be performed prior to commencing the work.
  - e. Changes (other than those that are of administrative nature) to approved documents are reviewed and approved by the same organizations that performed the original review and approval unless delegated to other appropriately qualified organizations.
  - f. Approved changes to documents are promptly incorporated into instructions, procedures, drawings and other appropriate documents.
  - g. Obsolete or superseded documents are controlled to prevent their inadvertent use.
- 6.2.3 Current revision status of documents, such as instructions, procedures, drawings, and specifications shall be identified and maintained.

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**7.0    SECTION 7 - CONTROL OF PURCHASED MATERIAL, EQUIPMENT, AND SERVICES**

**7.1    PURPOSE**

This section establishes controls to assure that safety-related items and services, whether purchased directly or through contractors and subcontractors, conform to procurement documents.

**7.2    GENERAL**

7.2.1 Procedures/instructions shall be established and implemented for the control of purchased materials, equipment, and services. These procedures/instructions shall clearly describe the actions to be accomplished and identify those positions or groups responsible for performing those actions.

7.2.2 Material, equipment, services and spare/replacement parts (other than commercial grade items as defined in 10CFR 21) for safety-related structures, systems and components:

- a.    Shall have a technical evaluation to assure that requirements for acceptable item(s) are specified in the procurement documents.
- b.    Shall be procured from vendors whose quality assurance qualifications have been affirmed, either prior to or after award of the contract, by Supplier Quality personnel, and
- c.    Shall be subject to the quality assurance program controls and to technical requirements at least equal to the original technical requirements or to revised controls that have been properly reviewed and approved.

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7.2.3 Material, equipment, services and spare/replacement parts for safety-related structures, systems and components that are commercial grade items as defined in 10CFR 21:

- a. Shall have a technical evaluation to assure that requirements for acceptable item(s) are specified in the procurement documents.
- b. Shall have acceptance methods to provide reasonable assurance the item(s) received is the item(s) which was specified. These may include one or more of the methods of Paragraphs 7.2.4, 7.2.5, or 7.2.6 as specified by the Technical Evaluation.

7.2.4 Evaluation of vendors, including review and concurrence of vendors' QA programs, shall be performed by Supplier Quality with assistance if required from Procurement or Engineering personnel competent in determining the ability of vendors to provide acceptable quality products. Source selection will be based on one or more of the following:

- a. The ability of the vendor to comply with those elements of 10CFR 50 Appendix B applicable to the type of material, equipment, or services being procured.
- b. A review of previous record and performance of vendors who have provided similar articles of the type being procured.
- c. A survey of the vendor's facilities and QA program to determine his capability to supply a product which meets the design, manufacturing, and quality requirements.

7.2.5 Source verification (vendor surveillance, inspection and audit) shall be commensurate with the relative importance, complexity, and quantity of the items or service procured and the vendor's quality performance. In-process and final surveillance requirements of vendor products shall be determined in advance and performed to assure conformance with procurement document requirements. Source verification is not required to be performed where the quality of the item can be verified by review of test reports, inspection upon receipt, or other means. Source verification activities shall include evaluation of vendor furnished Certificates of Conformance and/or vendor's Certification System.

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7.2.6 Receiving inspection of vendor furnished items shall be performed to assure that:

- a. The item is properly identified and corresponds to the identification on the procurement document and the receiving documentation.
- b. The item and the acceptance records satisfy the inspection instruction prior to relying upon the item to perform its safety function.
- c. Specified inspection, test, and other records are complete and available at the site prior to relying upon the item to perform its safety function.
- d. Inspection status of accepted items is identified prior to their being released for storage, use or further work.

7.2.7 Documentary evidence that the vendor furnished items conform to the procurement requirements shall be retained at the site for the life of the items.

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## 8.0 IDENTIFICATION AND CONTROL OF MATERIALS, PARTS, AND COMPONENTS

### 8.1 PURPOSE

This section sets forth requirements for identification and control of safety-related materials, parts, and components.

### 8.2 GENERAL

Procedures and/or instructions shall be established and implemented for the identification and control of items so as to prevent use of incorrect or defective items. These procedures and/or instructions shall assure that:

- 8.2.1 Identification requirements for items are established during initial planning (i.e., during generation of specifications and design drawings).
- 8.2.2 Identification of the item is maintained by heat number, part number, serial number or other appropriate means.
- 8.2.3 Identification of the item is maintained either on the item or on records traceable to the item.
- 8.2.4 The traceability of the item to appropriate documentation, such as specific inspection/test records, code data reports, and physical/chemical mill test reports, is maintained when such traceability is required by codes, standards, or specifications.
- 8.2.5 Identification of the item is maintained throughout fabrication, shipping, installation and use of the item.
- 8.2.6 The location and method (such as application of metal tags or markings) of identification do not affect the safety-related function of the item.
- 8.2.7 Correct identification of the item is verified prior to release of the item for fabrication, shipping, assembling and installation.

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## 9.0 SECTION 9 – CONTROL OF SPECIAL PROCESSES

This section sets forth requirements for special process activities which affect safety-related structures, systems, and components.

### 9.1 GENERAL

- 9.1.1 Special processes are those that require interim in-process controls in addition to final inspection and/or examination to assure achievement of required quality.
- 9.1.2 Procedures/instructions shall be established and implemented to assure adequate performance and control of special processes such as welding, heat treating, nondestructive testing, and chemical cleaning. These procedures/instructions shall contain provisions for:
  - a. Qualifying the personnel, equipment, and procedures to be utilized for performing special processes.
  - b. Documenting the evidence (inspection or process results) of acceptable performance of special processes.
- 9.1.3 Special processes shall be performed by qualified personnel utilizing qualified procedures and qualified equipment in accordance with applicable codes, standards, and specifications. For special processes not covered by existing codes or standards, the necessary qualifications of personnel, procedures, and equipment shall be defined in appropriate documents.
- 9.1.4 Procedures, equipment, and personnel to be utilized for the performance of special processes shall be qualified/certified by authorized personnel from applicable organizations (e.g., Quality, Engineering, and Plant organizations, etc.).
- 9.1.5 Qualification records of procedures, equipment, and personnel associated with special processes shall be established, filed, and maintained.

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## 10.0 SECTION 10 – INSPECTION

This section sets forth requirements for inspection of activities that affect safety-related functions of plant items.

### 10.1 GENERAL

10.1.1 Inspections which provide assurance that safety-related plant items and activities conform to applicable specifications, drawings, codes, standards, and regulations, shall be performed and documented in accordance with written and approved procedures, instructions or check lists.

10.1.2 Inspection procedures, instructions or check lists will, as appropriate, provide for:

- a. Date inspection performed
- b. Description of inspection method
- c. Identification of characteristics and activities to be inspected.
- d. Acceptance or rejection criteria
- e. Identification of required procedures, drawings and specifications
- f. Specifying necessary measuring and test equipment including accuracy requirements
- g. Identity of inspector and/or data recorder

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- 10.1.3 Inspections shall be performed by individuals other than those who performed or directly supervised the activity being inspected. Inspections, in general, will be performed by or under the supervision of the Energy Northwest Quality organization. However, personnel from the performing groups (Operations, Maintenance, Technical, Test and Startup, etc.) may be utilized for performing certain inspections associated with normal plant operation. When such is the case, the related work procedures shall require (a) demonstration of correct performance of the work through a functional test where the work involves breaching a pressure retaining boundary, and (b) review and concurrence by the Energy Northwest Quality organization of qualification criteria of inspection personnel prior to initiation of inspection activity.
- 10.1.4 Individuals performing inspections shall be qualified and the status of their qualifications shall be maintained current.
- 10.1.5 Where mandatory inspection holdpoints are identified in pertinent documents, work shall not proceed beyond those holdpoints without the consent of the responsible inspection personnel or group.
- 10.1.6 Inspection results shall be documented, evaluated, and their status recorded.

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## 11.0 SECTION 11 - TEST CONTROL

### 11.1 PURPOSE

This section sets forth requirements for testing to assure that safety-related plant items will perform satisfactorily in service.

### 11.2 GENERAL

11.2.1 Tests required to demonstrate that plant items will perform satisfactorily in service shall be identified, documented, and performed in accordance with written and approved procedures/instructions.

11.2.2 Tests will include, as appropriate, the following:

- a. Prototype qualification tests
- b. Proof tests prior to installation
- c. Preoperational and startup tests
- d. Surveillance tests during plant operation
- e. Tests associated with plant modification and maintenance activities

11.2.3 Test procedures/instructions shall incorporate or reference, as appropriate, the following:

- a. Instructions for performing the test
- b. Test prerequisites such as calibrated instruments, adequate test equipment, completeness of the item to be tested, and suitable environmental conditions.
- c. Mandatory inspection hold points
- d. Acceptance/rejection criteria
- e. The requirements and acceptance limits contained in the applicable design documents
- f. Methods of documenting or recording test data and results
- g. Provisions for assuring that test prerequisites have been met.

11.2.4 Test results shall be documented, evaluated, and their status recorded by a responsible individual or group.

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## 12.0 SECTION 12 - CONTROL OF MEASURING AND TEST EQUIPMENT

### 12.1 PURPOSE

This section sets forth the requirements to establish those measures which will assure that tools, gages, instruments, and other measuring and testing devices used in activities affecting quality are controlled, calibrated, and adjusted at specified periods in order to maintain accuracy within necessary limits.

Measuring and test equipment does not include permanently installed operating equipment or test equipment used for preliminary checks where data obtained will not be used to determine acceptability or be the basis for design or engineering evaluation. Additionally, calibration and control measures are not required for rulers, tape measures, levels and other such devices if normal commercial manufacturing practices provide adequate accuracy.

### 12.2 GENERAL

12.2.1 Measuring and test equipment (M&TE) shall be calibrated and adjusted using approved procedures/instructions.

12.2.2 A calibration program for the control and use of M&TE shall be established, and implemented. This program, as a minimum, shall provide for the following:

- a. Unique identification of the item and its traceability to the calibration test data.
- b. Labeling or tagging (or otherwise controlling) to indicate the due date of the next calibration.
- c. Calibration technique and frequency.
- d. Generation and maintenance of records which indicate the complete listing of all items under the calibration system together with their current calibration status.
- e. Controlled environment conditions for sensitive and close tolerance M&TE.

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- 12.3 M&TE shall be calibrated against certified calibrating standards having known valid relationships to nationally recognized standards. If no national standards exist, the basis for calibration will be documented.
- 12.4 Standards adequacy will be determined by computing the ratio of test instrument tolerance to standard tolerance (Test Uncertainty Ratio, or TUR). A TUR of 4:1 or greater is considered acceptable. TURs of less 4:1 will be handled on a case by case basis, either by widening the test instrument tolerance (with the concurrence of the customer), or by mathematically reducing the test instrument tolerance to provide the same level of confidence as a 4:1 ratio. Other methodologies may be employed with the concurrence of the customer, including a statement of uncertainty or documentation of the actual ratio, if less than 4:1. The method used will be documented.
- 12.5 M&TE shall be calibrated and maintained at specified periods based on the required accuracy, purpose, stability characteristics, and other conditions affecting the measurement.
- 12.6 When an item of M&TE is found to be out of calibration, an evaluation shall be made and documented to determine the validity of previous inspection/test results and the disposition to be made of items previously inspected/tested.

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### 13.0 SECTION 13 – HANDLING STORAGE AND SHIPPING

#### 13.1 PURPOSE

This section establishes controls for cleaning, handling, storage, packaging, shipping and preservation of safety-related items.

#### 13.2 GENERAL

- 13.2.1 Cleaning, handling, storage, packaging, shipping and preservation of items shall be accomplished in accordance with written procedures/instructions, to prevent damage, loss or deterioration by environmental conditions. These procedures/instructions shall be prepared in accordance with the design and procurement requirements of the items.
- 13.2.2 When necessary for particular items, special coverings, special equipment and special protective environments, such as inert gas atmosphere, specific moisture content levels, and temperature levels, shall be specified, provided, and their existence verified.
- 13.2.3 Responsible personnel shall assure that items are identified, inventoried, adequately packaged to ensure integrity during transit, properly addressed and released and that these activities are documented.
- 13.2.4 Measures shall be established and implemented to control the storage (including control of shelf-life) of chemicals, reagents, lubricants, spare parts, and other consumable materials for safety-related applications.

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#### 14.0 SECTION 14 – INSPECTION, TEST, AND OPERATING STATUS

##### 14.1 PURPOSE

This section sets forth the requirements for identifying the inspection, test, and operating status of safety-related items.

##### 14.2 GENERAL

Procedures/instructions shall be established and implemented for identifying the inspection, test, and operating status of plant items. These procedures/instructions shall include provisions for assuring that:

- 14.2.1 The application and removal of status indicators (stamps, tags, labels, routing cards, physical barriers, etc.) is controlled.
- 14.2.2 Items which require inspections and tests are identified and controlled to preclude bypassing of such inspections and tests.
- 14.2.3 The status of inspections and tests performed upon individual plant items is indicated by the use of status indicators or other suitable means.
- 14.2.4 The operating status of nonconforming, inoperative, or malfunctioning installed plant items is documented and identified to prevent inadvertent operation.

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## 15.0 SECTION 15 - NONCONFORMANCE MATERIALS, PARTS, OR COMPONENTS

### 15.1 PURPOSE

This section sets forth requirements for the control of safety-related items, services, or activities which do not conform to specified requirements.

### 15.2 GENERAL

15.2.1 Measures shall be established to control nonconforming items to prevent their inadvertent use or installation. These measures shall include, as appropriate, procedures/instructions for identification, review, documentation, segregation, disposition, approval, and notification to affected organizations of nonconforming items.

15.2.2 Measures shall be established and documented defining the responsibility and authority for determining and approving the disposition of nonconforming items.

15.2.3 Nonconformances shall be documented. This documentation shall:

- a. Clearly identify the nonconforming item; and
- b. Describe the nonconformance, the disposition of nonconformance, and inspection/test requirements (where applicable).

15.2.4 Nonconforming items shall be reviewed and accepted for use-as-is, rejected, repaired, or reworked in accordance with documented procedures/instructions. The Energy Northwest Quality organization shall review nonconformances on a sampling basis, during audits or surveillances or other reviews to assure that dispositions have been evaluated and approved. The organization responsible for the Corrective Action Program reviews nonconformance reports to assure dispositions have been evaluated and approved.

15.2.5 Acceptability of repaired, reworked and replaced item shall be verified and documented by inspecting and/or testing the item in accordance with original inspection and/or test requirements or approved alternatives.

15.2.6 Where feasible, nonconforming items shall be segregated from other acceptable items and/or uniquely identified as nonconforming until properly dispositioned for use.

15.2.7 Reports of nonconformances shall be periodically analyzed by the Energy Northwest Quality organization to identify quality trends. Significant results shall be referred to appropriate management for review and assessment.

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## 16.0 SECTION 16 - CORRECTIVE ACTION

### 16.1 PURPOSE

This section sets forth the requirements for identification, correction, documentation, and reporting of conditions adverse to quality such as failures, malfunctions, deficiencies, deviations, defective material and equipment, and nonconformances.

### 16.2 GENERAL

16.2.1 Conditions adverse to quality shall be evaluated and the need for corrective actions determined in accordance with established procedures. These procedures shall provide for prompt identification and correction of conditions.

16.2.2 For conditions significantly adverse to quality, the corrective action procedures shall provide for the following:

- a. Determination of the cause of the condition.
- b. Corrective action so as to preclude repetition of the condition.
- c. Verification of the implementation of the corrective action.

16.2.3 Conditions significantly adverse to quality, its cause, and the corrective action taken shall be documented and reported to appropriate levels of management for review and assessment.

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## 17.0 SECTION 17 - RECORDS

### 17.1 PURPOSE

This section sets forth requirements for generation, transmittal, retention, and maintenance of quality assurance records for Energy Northwest's nuclear power plant.

### 17.2 GENERAL

17.2.1 Sufficient records shall be maintained to furnish evidence of the quality of safety-related plant items and activities. As a minimum these records shall include the following:

- a. Operating logs
- b. Results of design reviews, inspections, tests, audits, and material analysis
- c. Monitoring of work performance
- d. Qualifications of personnel, procedures, and equipment.
- e. Drawings, specifications, procedures, and procurement documents.
- f. Nonconformance and corrective action reports
- g. Records as required by Appendix III, Section 4.0.

17.2.2 Inspection and test records shall identify the following where applicable:

- a. Inspector and/or data recorder
- b. The type of observation
- c. The date and results of inspection or test.
- d. Acceptability of results.
- e. The action taken to resolve any deficiencies noted.

17.2.3 Quality assurance records shall be generated (prepared, reviewed, and approved), accumulated, transmitted for incorporation into the records retention system, retained, maintained, and controlled in accordance with documented procedures and/or instructions.

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17.2.4 The quality assurance records shall be organized and filed so that each document is identifiable and retrievable.

17.2.5 The quality assurance records shall be filed and maintained in facilities that provide protection from possible deterioration or damage and shall be controlled to prevent loss.

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## 18.0 SECTION 18 - AUDITS

### 18.1 PURPOSE

This section sets forth requirements for auditing to verify implementation and determine the effectiveness of the QA Program.

### 18.2 GENERAL

18.2.1 A comprehensive system of planned and documented audits by the Quality organization, shall be carried out to verify compliance with applicable aspects of the QA Program. These audits shall consist of both internal audits of Energy Northwest's nuclear power plants and other Energy Northwest organizations and external audits of Energy Northwest vendors performing activities covered by the QA Program. External audits will be scheduled in accordance with the requirements of Regulatory Guide 1.144.

18.2.2 Audits shall include the objective evaluation of work areas, activities, processes, and items; review of documents and records; and evaluation of quality-related practices, procedures and instructions to determine the effectiveness of implementation of the QA Program.

18.2.3 Surveillances and assessments performed by the Quality Organization are performed as an integral part of the evaluation (Audit) program and provide inprocess coverage of the applicable areas to supplement the audit program.

18.2.4 Audits shall be scheduled based upon the status and safety importance of the activities.

18.2.5 Audits shall be performed in accordance with written procedures or check lists and conducted by appropriately trained personnel not having direct responsibilities in the areas being audited.

18.2.6 Audit results shall be documented by auditing personnel and reviewed by management having responsibility in the area audited.

18.2.7 Follow-up action on adverse audit findings shall be accomplished.

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## APPENDIX I

### QUALIFICATION REQUIREMENTS


The minimum qualification requirements for key Quality Assurance personnel meet ANSI/ANS-3.1-1978. The experience time requirement of two years for the manager in implementation of the quality assurance program may be met by the individual participation in one of the following:

- a. QA or QC function within a quality assurance organization.
- b. Involvement in program quality for programs subject to QA/QC audits or inspection.

Individuals filling positions who met the previous commitment at the time of implementation of this commitment can be considered to meet any more restrictive aspects of the requirements of this commitment for that position without further review and documentation.

Equivalency to a Bachelor's degree in Engineering or a related science degree will be determined based upon an evaluation of the following factors:

1. High school diploma or GED.
2. Sixty (60) semester hours of related technical education taught at the college level (900 classroom or instructor conducted hours).
3. Qualified as an NRC senior operator at the assigned plant.
4. Four (4) years of additional experience in his area of responsibility.
5. Four (4) years of supervisory or management experience.
6. Demonstrated ability to communicate clearly (verbally and in writing).
7. Certification of academic ability and knowledge by corporate management.
8. Successful completion of the Engineer-In-Training examination.
9. Professional Engineer License.
10. Associated degree in Engineering or a related science.

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## APPENDIX II

### "POSITION STATEMENTS"

This Appendix identifies those quality-related Regulatory Guides which Energy Northwest intends to follow during operation phase of its nuclear power plant. However, where the Regulatory Positions stated in these Regulatory Guides could lead to misunderstanding, or where alternate methods and/or solutions are implemented for accomplishment of Regulatory Positions, they are also described in this Appendix. The commitments to comply with applicable Regulatory Guides not addressed in this Appendix are or will be documented in the applicable Final Safety Analysis Report. The Positions, described in this Appendix, will be incorporated into procedures and/or instructions for applicable activities. This Appendix will be revised, as and when necessary, by Energy Northwest's Quality Department, in accordance with the provisions of Section 2 of the QA Program.

#### II.1 REGULATORY GUIDE 1.8, REV. 1-R (May 1977) - "Personnel Selection and Training"

Energy Northwest will implement the Regulatory Position of Regulatory Guide 1.8, Rev. 1-R (May 1977). For details, see Chapter 13 of the Final Safety Analysis Report for WNP-2.

#### II.2 REGULATORY GUIDE 1.26, REV. 3 (February 1976) - "Quality Group Classifications and Standards for Water-, Steam-, and Radioactive- Waste-Containing Components of Nuclear Power Plants"

Energy Northwest will implement the Regulatory Position of Regulatory Guide 1.26, Rev. 3 (February 1976).

#### II.3 REGULATORY GUIDE 1.29, REV. 3 (September 1978) - "Seismic Design Classification"

Energy Northwest will implement the Regulatory Position of Regulatory Guide 1.29, Rev. 3 (September 1978).

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II.4 REGULATORY GUIDE 1.30, (Safety Guide 30, August 11, 1972) - "Quality Assurance Requirements for the Installation, Inspection and Testing of Instrumentation and Electric Equipment"

Energy Northwest will implement the Regulatory Position of Regulatory Guide 1.30 (Safety Guide 30, August 11, 1972), subject to the following:

1. Regulatory Position C.1 of Regulatory Guide 1.30 (Safety Guide 30, August 11, 1972) states that ANSI N45.2.4-1972 should be used in conjunction with ANSI N45.2-1971, "Quality Assurance Program Requirements for Nuclear Power Plants." It is Energy Northwest's position that ANSI N45.2-1971 is not applicable for operational phase activities of nuclear power plants. Instead Energy Northwest will comply with its Position Statement on Regulatory Guide 1.33.
2. Section 1.1 of ANSI N45.2.4-1972: This standard will be applied to the installation, inspection, and testing of Class 1E instrumentation, electrical systems and/or components for plant modifications comparable in nature and extent to the activities normally occurring during the initial plant design and construction phase.
3. Section 3(3) of ANSI N45.2.4-1972: Checking of records is normally accomplished during periodic surveillances and audits of the storage facility. The checking of storage records for each individual item prior to installation is not planned.
4. Section 5.1.2 of ANSI N45.2.4-1972: Inspections to verify housekeeping will be done as stated in Energy Northwest position statement on Regulatory Guide 1.39.
5. Section 5.2.1 of ANSI N45.2.4-1972: Tests will include those listed as appropriate. The manufacturers' recommendations shall be considered. The test procedure will specify the actual test to be performed.
6. Section 9 of ANSI N45.2.4-1972: Energy Northwest's position, stated herein, does not address the codes and standards listed and/or referenced in this paragraph. Such position will be developed in the future, if the need arises.
7. Appendix A "Supplementary Provisions for Multi-Unit Stations" to ANSI N45.2.4-1972 is not considered applicable to Energy Northwest nuclear power plant
8. Appendix B "Additional Codes, Standards and Guides" to ANSI N45.2.4-1972: Refer to Energy Northwest Position on Section 9 of ANSI N45.2.4-1972.

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**II.5 REGULATORY GUIDE 1.33, REV. 2 (February 1978) - "Quality Assurance Program Requirements (Operation)"**

Energy Northwest will implement the Regulatory Position of Regulatory Guide 1.33, Rev. 2 (February 1978), subject to the following:

1. Regulatory Position C.2 of Regulatory Guide 1.33, Rev. 2 (February 1978) implies that the provisions contained in the latest revisions of the Regulatory Guides, listed therein, will be followed. Energy Northwest will follow its position statements on applicable Regulatory Guides as described throughout this Appendix.
2. Regulatory Position C.4 of Regulatory Guide 1.33, Rev. 2 (February 1978). This section establishes minimum two-year audit frequency for all safety-related functions and recommends audit frequencies specific to Corrective Action, Facility Operation, and Staff Performance, Training, and Qualifications. Energy Northwest will perform audits at frequencies as discussed in Section 2.2.8 Appendix III instead of this section.
3. Section 5.2.13.4 of ANSI N18.7-1976/ANS-3.2: The third paragraph of this section is revised to read, "Special handling tools and equipment shall be inspected and/or tested, as necessary, in accordance with written procedures and at specific times to verify that the tools and equipment are adequately maintained."
4. Section 5.2.15 of ANSI N18.7-1976/ANS-3.2: The fourth paragraph of this section is replaced with the following (the remaining text of this section is unchanged):

"Plant procedures shall be reviewed by an individual knowledgeable in the area affected by the procedures as follows: (1) Nonroutine plant procedures, such as emergency operating procedures, emergency support procedures, abnormal operating procedures (including annunciator response procedures), and emergency plan implementing procedures, and other procedures whose usage may be dictated by an event, shall be reviewed at least every two years and revised as appropriate, (2) Routine plant procedures may be reviewed in several ways, in lieu of once every two years: complete use of the procedure; detailed scrutiny of the procedure as part of a documented training program, drill, simulator exercise; or other such activity. A procedure deviation is not acceptable for credit as a biennial review. Evidence of complete procedure use and/or training records shall serve as adequate documentation for performance of the biennial review, (3) Routine plant procedures that have not been used for two years shall be reviewed before use to determine if changes are necessary, and (4) A revision of a procedure includes and constitutes a comprehensive procedure review."

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This alternate to the biennial procedure review requirement shall be supported by a Quality Assurance audit of a representative sample of routine plant procedures that are used more frequently than every two years. The audit shall be conducted at least every two years to ensure the acceptability of the procedures, and to verify the procedure review and revision program is being implemented effectively.

The procedure review and revision process is a dynamic process based on the internal identification and/or external receipt of new or revised source material. Evaluation and implementation of proposed changes to procedures occur upon identification of the need for such changes, rather than at a set review period. Programs are in place that determine if procedure revisions are required and when such changes are to be implemented. These programs serve to facilitate the timely review of procedures while ensuring both their accuracy and up-to-date status. Some examples of this dynamic review process used to identify the need for revisions to procedures include: Use of Controlled Plant Procedures; Technical Specification Surveillance Testing; Plant Modifications; Control of Nonconformances and Corrective Action; External Operational Experience Review; Vendors' Operating and Maintenance Manuals; Technical Specification, FSAR, ODCM Change Control Process; Revision of Master Data Sheets and Setpoints; Conduct of Infrequently Performed Tests or Evolutions; Conduct of Licensing Activities; and Review Committees.

5. Section 5.2.17 of ANSI N18.7-1976/ANS-3.2 states that inspection of operating activities may be conducted by second-line supervisory personnel or by other qualified personnel not assigned first-line supervisory responsibility for conduct of the work. Energy Northwest's position is to allow the plant operations' first-line supervisors to perform inspections of surveillance tests, provided that an after-the-fact review of surveillance documentation is performed by the second-line supervisor or by other personnel not assigned first-line responsibility for the conduct of the work.
6. Sections 5.2.19.1 and 5.2.19.2 of ANSI N18.7-1976/ANS-3.2 describe rules of practice for preoperational and startup test program. Energy Northwest intends to comply with the provisions of these sections. In cases, where conflicts exist between these sections and Regulatory Guide 1.68, Energy Northwest will comply with the implementation of Regulatory Guide 1.68 as described in Chapter 14 "Initial Test Program" of the Final Safety Analysis Report.

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**II.6 REGULATORY GUIDE 1.37, (March 16, 1973) - "Quality Assurance Requirements for Cleaning of Fluid Systems and Associated Components of Water-Cooled Nuclear Power Plants"**

Energy Northwest will implement the Regulatory Position of Regulatory Guide 1.37, (March 16, 1973), subject to the following:

1. Regulatory Position C.4 of Regulatory Guide 1.37 (March 16, 1973) states, in part, "Chemical compounds that could contribute to intergranular cracking or stress-corrosion cracking should not be used with austenitic stainless steel and nickel-base alloys." In clarification, Energy Northwest will either follow the chemical composition limits established by its Nuclear Steam Supply System vendor or establish such limits based upon a documented engineering evaluation.
2. Regulatory Position C.5 of Regulatory Guide 1.37 (March 16, 1973) states, in part, "Specifically, tools which contain materials that could contribute to intergranular cracking or which, because of previous usage, may have become contaminated with such materials should not be used on surfaces of corrosion-resistant alloys." In clarification, Energy Northwest will either follow the chemical composition limits established by its Nuclear Steam Supply System (NSSS) vendor, or establish such limits based upon a documented engineering evaluation.
3. Section 2.1 of ANSI N45.2.1-1973 states, in part, "Planning for cleaning activities shall include a review of the system and component design specifications and drawings. In clarification of this requirement, a review of system and component design specifications and drawings will be required for only those modifications which change the design of a fluid system.
4. Section 2.3 of ANSI N45.2.1-1973, last sentence, is revised to read, "Test reports shall include an evaluation of the acceptability of inspection and test results and provide for identifying the individual who performed the evaluation."
5. Section 3.1.2.1 of ANSI N45.2.1-1973 states, in part, "Scattered areas of rust are permissible provided the aggregate area of rust does not exceed two square inches in any one square foot area." Energy Northwest considers this two square inch limit as a guide only. Adequate discretion by experienced personnel will be used in all cases.
6. Section 3.1.2.5 of ANSI N45.2.1-1973 states, in part, "There shall be no evidence of organic contamination in the effluent water or on the filter." The presence of organic contamination will be determined visually or by feel.

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7. Section 4 of ANSI N45.2.1-1973, second sentence, is revised to read, "Inspections, examinations, or tests for cleanliness shall be performed if it is suspected that cleanliness has been affected by transportation to, or storage at the installation site."
8. Section 7.4 of ANSI N45.2.1-1973 requires checking of cleaning solutions for effectiveness of inhibitors (if used). In clarification of this requirement, the effectiveness of inhibitors (if used) will be determined by documentation in technical literature or manufacturer's or vendor's recommendations.

**II.7 REGULATORY GUIDE 1.38, REV. 2 (May 1977) - "Quality Assurance Requirements for Packaging, Shipping, Receiving, Storage and Handling of Items for Water-Cooled Nuclear Power Plants"**

Energy Northwest will implement the Regulatory Position of Regulatory Guide 1.38, Rev. 2 (May 1977), subject to the following:

1. Section 3.2.1 (1) of ANSI N45.2.2-1972: Temperature and humidity control considerations for packaging of Level A items are not considered applicable to nuclear fuel assemblies unless recommended otherwise by the nuclear fuel manufacturer. Energy Northwest will abide by the manufacturer's recommendation.
2. Section 3.5.2 of ANSI N45.2.2-1972, last sentence, is revised to read as, "Tapes used for identification rather than sealing which are not near a welding operation may remain indefinitely (see also Appendix Section 3.5.2 for additional requirements)."
3. Section 3.7.1 (1) of ANSI N45.2.2-1972: Energy Northwest may use cleated, sheathed boxes for loads up to 1,000 pounds rather than 500 pounds limit imposed here. This type of box has been tested by the WNP-2 Nuclear Steam Supply System vendor and found safe for loads up to 1,000 pounds. Other national standards allow the 1,000 pound designation (see Federal Specification PPP-B-601).
4. Section 6.1.2 (1) of ANSI N45.2.2-1972: Temperature and humidity controls required for storage of Level A items are not considered applicable for nuclear fuel assemblies unless recommended otherwise by the nuclear fuel manufacturer. Energy Northwest will abide by the manufacturer's recommendation.

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5. Section 6.4.2 of ANSI N45.2.2 gives detailed requirements for care of items in storage. In clarification, Energy Northwest will either follow manufacturer's recommendation or follow its own requirements, established based upon a documented engineering evaluation, concerning maintenance of protective covers, seals, and caps; maintenance of preservatives and inert atmosphere; energization of instrument racks and space heaters; insulation resistance testing; and rotation of shafts for rotating equipment.
6. Appendix Sections A3.4.1 (4) and A3.4.1 (5) of ANSI N45.2.2-1972: During printing of the standard, a transposition occurred between the last sentences of these sections. Energy Northwest will comply with the correct wording which reads as follows:

A3.4.1 (4), last sentence: However, preservatives for inaccessible inside surfaces of pumps, valves and pipe for systems containing reactor coolant water shall be the water flushable type.

A3.4.1 (5): The name of the preservative used shall be indicated to facilitate touch up.

## II.8 REGULATORY GUIDE 1.39, REV. 2 (September 1977) - "Housekeeping Requirements for Water-Cooled Nuclear Power Plants"

Energy Northwest will implement the Regulatory Position of Regulatory Guide 1.39, Rev. 2 (September 1977), subject to the following:

Section 2.1 of ANSI N45.2.3-1973 requires the establishment of cleanness requirements for housekeeping activities on the basis of zone designations. Energy Northwest considers these zone designations and the requirements associated with each zone as impractical for implementation during the operations phase. Procedures or instructions for housekeeping activities, which include the applicable requirements outlined in Section 2.1 of ANSI N45.2.3-1973 and which take into account the radiation control considerations, security considerations and cleanness requirements, will be developed on case by case basis for maintenance and modification work to be performed.

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Energy Northwest will implement the Regulatory Position of Regulatory Guide 1.58, Rev. 1 (September 1980), subject to the following:

1. Regulatory Position C.5 of Regulatory Guide 1.58, Rev. 1 (September 1980) implies that individuals who review and approve inspection, examination, and testing procedures and those who evaluate the adequacy of such procedures to accomplish the inspection, examination, and test objectives, should meet the Level III capability requirements delineated in Table I of ANSI/ASME N45.2.6-1978. Not all Energy Northwest personnel performing the types of cited functions will meet the Level III capability requirements of Table 1 of ANSI/ASME N45.2.6-1978. However, personnel performing the cited functions will be determined by Energy Northwest management (through evaluation of their education, training, and experience) to be fully qualified and competent. The basis for the determination will be documented.
2. Section 1.2 of ANSI/ASME N45.2.6-1978, fourth paragraph, states that the requirements of this Standard apply to personnel of the owners and their suppliers. In clarification, the extent of application of the requirements of ANSI/ASME N45.2.6-1978 to Energy Northwest suppliers will depend upon the nature and extent of materials or services furnished, and as further described in Energy Northwest positions on Section 2.4 and 3 of ANSI/ASME N45.2.6-1978.
3. Section 2.1.2 of ANSI/ASME N45.2.6-1978 implies that personnel performing non-NDE type of inspections, examinations, and testing will be formally certified. Energy Northwest does not plan this formal certification. Instead, Energy Northwest will select such personnel to predetermined qualification requirements for the specific task based on their education, experience, and training. Formal training records, when used as the basis for qualification, will be maintained on file.
4. Section 2.4 of ANSI/ASME N45.2.6-1978 requires issuance of formal certification to individuals and specifies the details of the information to be included in the certificate. Energy Northwest does not plan to issue formal certificates to individuals within the scope of ANSI/ASME N45.2.6-1978 and Regulatory Guide 1.8. However, information similar to that described in this section of the Standard will be available in documented form attesting that the individual is capable of performing the assigned task(s). Energy Northwest will use a similar approach in evaluating supplier compliance with this section of the Standard.

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5. Section 3 of ANSI/ASME N45.2.6-1978 divides the capability requirements of inspection, examination, and testing personnel into three levels, namely Level I, Level II, and Level III. Energy Northwest will not assign these levels to its personnel performing inspection, examination, and testing activities. However, the selection of personnel for particular tasks will be such as to match the capabilities to the types of tasks and maintain the intent of the three levels. The judgement to determine that a person's qualifications and capabilities meet the intent of a certain level of inspection, examination, and testing function is made through the normal management process by using established administrative and personnel procedures. Documentation for such justification will be maintained on file. A similar approach will be used to evaluate the qualifications of non-NDE personnel of Energy Northwest suppliers.

**II.10 REGULATORY GUIDE 1.64, REV. 2 (June 1976) - "Quality Assurance Requirements for the Design of Nuclear Power Plants"**

Energy Northwest will implement the Regulatory Position of Regulatory Guide 1.64, Rev. 2 (June 1976), subject to the following:

Regulatory Position C.2 of Regulatory Guide 1.64, Rev. 2 (June 1976) states that individuals performing design verification should not have immediate supervisory responsibility for the individual performing the design. It further states that while design verification by the immediate supervisor is encouraged, it should not be construed that such verification constitutes the required independent design verification. It is Energy Northwest's position that if the designer's immediate supervisor is the most technically qualified individual available in the organization to perform a design verification by design review, this review may be conducted by the supervisor, providing that:

- a. The justification is individually documented and approved in advance by the supervisor's management and
- b. Quality Assurance audits surveillances or assessments cover the frequency and effectiveness of use of supervisors as design verifiers to guard against abuse.

**QUALITY ASSURANCE PROGRAM MANUAL****II.11 REGULATORY GUIDE 1.74 (February 1974) - "Quality Assurance Terms and Definitions"**

Energy Northwest will implement the Regulatory Position of Regulatory Guide 1.74 (February 1974), subject to the following:

1. Regulatory Position "C" of Regulatory Guide 1.74 (February 1974) specifies certain documents recommended be included in the definition of "procurement documents", defined in ANSI N45.2.10-1973. Energy Northwest will use the following definition:

Procurement Documents - Purchase requisitions, purchase orders and contracts with attachments necessary to specify/verify requirements.

2. Section 2 of ANSI N45.2.10-1973: The definition of "specification" is revised to read as follows:

Specification - A statement of a set of requirements to be satisfied by a product, a material, a service or process indicating, whenever appropriate, the procedure by means of which it may be determined whether the requirements given are satisfied.

**II.12 REGULATORY GUIDE 1.88, REV. 2 (October 1976) - "Collection, Storage, and Maintenance of Nuclear Power Plant Quality Assurance Records"**

Energy Northwest will implement the Regulatory Position of Regulatory Guide 1.88, Rev. 2 (October 1976), subject to the following:

1. Regulatory Position C.2 of Regulatory Guide 1.88, Rev. 2 (October 1976) endorses the 4-hour fire rating requirements for a single records storage facility as described in Section 5.6 of ANSI N45.2.9-1974. Energy Northwest modifies this 4-hour rating requirement of ANSI N45.2.9-1974 to 2-hour fire rating requirement. Accordingly, Energy Northwest will comply with a substitute to the third, fourth, and fifth paragraphs of Section 5.6 of ANSI N45.2.9-1974 which reads, "Where a single record storage is maintained, the QA records shall be maintained in any one of the following four (4):
  - a. A 2-hour vault meeting NFPA (National Fire Protection Association) No. 232-1975 without additional provisions.
  - b. 2-hour rated file containers meeting NFPA No. 232-1975 (Class B) without additional NFPA provisions.

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- c. 2-hour rated fire resistant file room meeting NFPA No. 232-1975 with the following additional provisions:
- 1) Early warning fire detection and automatic fire suppression shall be provided, with electronic supervision at a constantly attended central station.
  - 2) Records shall be stored in fully enclosed metal cabinets. Records shall not be permitted on open steel shelving. No storage of records shall be permitted on the floor of the facility. Adequate access and aisle ways shall be maintained at all times throughout the facility.
  - 3) Work not directly associated with records storage or retrieval shall be prohibited within the records storage facility. Examples of such prohibited activities include but are not limited to: records reproduction, film developing, and fabrication of microfiche cards.
  - 4) Smoking and eating/drinking shall be prohibited throughout the records storage facility.
  - 5) Ventilation, temperature, and humidity control equipment shall be protected inside with standard fire-door dampers where they penetrate fire barriers bounding the facility.
- d. A 2-hour fire rated facility meeting the following criteria and provisions:
- 1) Reinforced concrete, concrete block, masonry, or equal construction.
  - 2) Floor and roof with drainage control. If floor drain is provided, a check valve (or equal) shall be included.
  - 3) Doors, structure and frames, and hardware shall be designed to comply with the requirements of a minimum 2-hour fire rating.
  - 4) Sealant applied over walls as a moisture or condensation barrier.
  - 5) Surface sealant on floor providing a hard wear surface to minimize concrete dusting.
  - 6) Foundation sealant and provisions for drainage.
  - 7) Forced air circulation with filter system.

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- 8) Fire Protection System.
  - 9) Only those penetrations used exclusively for fire protection, communication, lighting, or temperature/humidity control are allowed; all such penetrations shall be sealed or dampered to comply with the minimum 2-hour fire protection rating.
  - 10) The construction details shall be reviewed for adequacy of protection of contents by a person who is competent in the technical field of fire protection and fire extinguishing.
  - 11) If the facility is located within a building or structure, the environment and construction of that building can provide a portion or all of the criteria (1) through (9).
2. Section 3.2.2 of ANSI N45.2.9-1974 is revised to read, "Index - The quality assurance records shall be indexed. The indexing system(s) shall include, as a minimum, record retention times and the location of the records within the record system. The indexing system(s) shall provide sufficient information which can be used to identify item(s) or activity(ies)."
  3. Section 5.4.3 of ANSI N45.2.9-1974 is revised to read, "Special Processed Records - Provisions shall be made for special processed records (such as radiographs, photographs, negatives, and microfilm) to prevent damage from excessive light, stacking, electromagnetic fields, and temperature. These provisions will be delineated in procedures and/or instructions which will incorporate, or take into consideration, available manufacturers' recommendations."
  4. Section 5.2 of ANSI N45.2.9 - 1974 is revised by adding a new second paragraph as follows:

In process Quality Assurance records may be maintained in temporary storage with the originating organization until transfer to the permanent plant file. Written storage procedures shall be prepared and a custodian designated with the responsibility to enforce the procedures. Storage procedures shall, at a minimum, address the following:

    - a. Identification of the records that may be maintained in temporary storage, the type of storage (single or dual) and the record storage location.

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- b. Use of lockable temporary storage containers with a minimum one hour fire rating and an Underwriters' Laboratory (UL) label (or equivalent). If the container does not have a fire rating label, the container should be certified by an individual competent in the field of fire protection.
- c. Use of "out" cards or other similar methods to track records removed from the file.
- d. Designation of a custodian with the authority to enforce the storage procedures.
- e. Provisions shall be made in the storage arrangement to prevent damage from condensation.
- f. Records shall not be stored loosely. Records shall be firmly attached in binders or placed in folders or envelopes for storage on shelving in containers. Steel file cabinets are preferred.
- g. Provisions shall be made for special processed records (such as radiographs, photographs, negatives, and microfilm) to prevent damage from excessive light, stacking, electromagnetic fields, and temperature. These provisions shall be delineated in procedures and/or instructions which will incorporate, or take into consideration, available manufacturers' recommendations.

**II.13 REGULATORY GUIDE 1.94, REV. 1 (April 1976) - "Quality Assurance Requirements for Installation, Inspection, and Testing of Structural Steel During the Construction Phase of Nuclear Power Plants"**

Regulatory Guide 1.94, Rev. 1 (April 1976) is not considered applicable to operations phase activities. However, the Regulatory Position of Regulatory Guide 1.94, Rev. 1 (April 1976), where appropriate, will be implemented for those applicable operational phase activities that are comparable to construction phase activities.

**QUALITY ASSURANCE PROGRAM MANUAL****II.14 REGULATORY GUIDE 1.116, REV. 0-R (May 1977) - "Quality Assurance Requirements for Installation, Inspection, and Testing of Mechanical Equipment and Systems"**

Energy Northwest will implement the Regulatory Position of Regulatory Guide 1.116, Rev. 0-R, (May 1977), subject to the following:

1. Regulatory Position C.3 of Regulatory Guide 1.116, Rev. 0-R (May 1977) recommends that the requirements of Section 5 of ANSI N45.2.8-1975 pertaining to preoperational tests, cold functional tests, and hot functional tests should be used in conjunction with Regulatory Guide 1.68. Energy Northwest will comply with the implementation of Regulatory Guide 1.68 as described in Chapter 14, "Initial Test Program," of the Final Safety Analysis Report.
2. Section 2.3 of ANSI N45.2.8-1975, last sentence is revised to read, "Test reports shall include an evaluation of the acceptability of inspection and test results and provide for identifying the individual who performed the evaluation."
3. Section 2.8.2 of ANSI N45.2.8-1975 states, "Records of calibration shall be included in inspection and test results." Energy Northwest does not intend to include calibration records in inspection and test results. Instead, the calibration records will be maintained in a separate file.
4. Section 2.9.e(6) of ANSI.2.8.1975 states, "Evidence that engineering or design changes are documented and approved prior to installation." Energy Northwest may permit installation of an item prior to approval of the related engineering or design change provided procedural controls, requiring evidence of engineering or design change approval prior to placing the affected item into service, are instituted.

**II.15 REGULATORY GUIDE 1.123, REV. 1 (July 1977) - "Quality Assurance Requirements for Control of Procurement of Items and Services for Nuclear Power Plants"**

Energy Northwest will implement the Regulatory Position of Regulatory Guide 1.123, Rev. 1 (July 1977), subject to the following:

Section 1.3 of ANSI N45.2.13-1976: Energy Northwest will comply with the definition of "procurement documents" as stated in its position statement on Regulatory Guide 1.74 (February 1974).

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II.16 REGULATORY GUIDE 1.144, REV. 1 (September 1980) - "Auditing of Quality Assurance Programs for Nuclear Power Plants"

Energy Northwest will implement the Regulatory Position of Regulatory Guide 1.144, Rev. 1 (September 1980), subject to the following:

Section 4.4.4 of ANSI N45.2.12-1977 requires the audit report to include an evaluation statement regarding the effectiveness of the quality assurance program elements that were audited. Since the audit by its very nature is an evaluation of the quality assurance program effectiveness, the audit report itself is considered to be an evaluation of the quality assurance program effectiveness. Therefore, this section of the Standard is revised to read "A Summary of Audit Results."

II.17 REGULATORY GUIDE 1.146, (August 1980) - Qualification of Quality Assurance Program Audit Personnel for Nuclear Power Plants"

Energy Northwest will implement the Regulatory Position of Regulatory Guide 1.146 (August 1980) to ANSI N45.2.23-1978.

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### APPENDIX III

#### "ADDITIONAL QUALITY PROGRAM REQUIREMENTS"

This Appendix identifies additional quality program requirements that were formally located in the WNP-2 Technical Specification, Section 6.0, Administrative Controls or in the FSAR. The following requirements have been incorporated by Energy Northwest organizations into their procedures and/or instructions. This Appendix will be revised, when necessary, in accordance with the provisions of Section 2 of the QA Program.

#### 1.0 NUCLEAR SAFETY ASSURANCE DIVISION (NSAD)

1.1 The NSAD shall function to examine unit operating characteristics, NRC issuances, industry advisories, Licensee Event Reports, and other sources of unit design and operating experience information, including units of similar design, which may indicate areas for improving unit safety. The NSAD shall make detailed recommendations for revised procedures, equipment and modifications, maintenance activities, operations activities, or other means of improving unit safety to the Quality Manager.

1.1.1 The NSAD shall be composed of at least five, dedicated, full-time engineers, with a minimum of three located on site. Each shall have a bachelor's degree in engineering or related science or qualifications meeting ANS.3.1. Draft Revision dated March 13, 1981, Section 4.2 or 4.4, or equivalent, as described in Section 4.1 and at least 2 years professional level experience in his field, at least 1 year of which experience shall be in the nuclear field.

1.1.2 The NSAD shall be responsible for maintaining surveillance of unit activities to provide independent verification (not responsible for sign-off function) that these activities are performed correctly and that human errors are reduced as much as practical.

1.1.3 Records of activities performed by the NSAD shall be prepared, maintained, and forwarded each calendar month to the Quality Manager.

#### 2.0 REVIEW AND AUDIT

##### 2.1 PLANT OPERATIONS COMMITTEE (POC)

The POC shall function to advise the Plant General Manager on all matters related to nuclear safety.

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- 2.1.1 The POC shall be composed of individuals experienced in one of the following functional areas:

Operations	Administrative Services
Maintenance	Radiation Protection
Engineering	Technical Services
Quality	Chemistry

- 2.1.2 The Plant General Manager, the POC Chairman, shall appoint, in writing, the POC Vice Chairman, and individual members. The qualifications of all members shall meet the requirements of ANSI/ANS-3.1-1981, Section 4.7, and have, cumulatively, expertise in the areas listed in 2.1.1, as a minimum.
- 2.1.3 All POC alternate members shall be appointed in writing by the POC Chairman or Vice Chairman to serve on a temporary basis.
- 2.1.4 The Plant Operations Committee shall meet at least once per calendar month and as convened by the POC Chairman or his designated alternate.
- 2.1.5 The quorum of the POC necessary for the performance of the POC responsibility and authority provisions of these requirements shall consist of the Chairman or Vice Chairman and four members including alternates. No more than two alternates shall make up the quorum.
- 2.1.6 The POC shall be responsible for:
- Review of 10CFR50.59 Safety Evaluations associated with procedures and programs required by Technical Specification 5.4 and changes thereto.
  - Review of all proposed tests and experiments that affect nuclear safety, as determined by the need for a 10 CFR 50.59 Safety Evaluation;
  - Review of all proposed changes to the Appendix A Technical Specifications;
  - Review of all proposed changes or modifications to unit system or equipment that affect nuclear safety, as determined by the need for a 10 CFR 50.59 Safety Evaluation;
  - Investigation of all violations of the Technical Specifications, including the preparation and forwarding of reports covering evaluation and recommendations to prevent recurrence, to the Chief Nuclear Officer and to the Corporate Nuclear Safety Review Board;

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- f. Review of all REPORTABLE EVENTS, as specified in 10 CFR 50.73;
- g. Review of unit operations to detect potential hazards to nuclear safety;
- h. Performance of special reviews, investigations, or analyses and reports thereon as requested by the Plant General Manager or the Corporate Nuclear Safety Review Board;
- i. Review of the Security Plan and submittal of recommended changes to the Corporate Nuclear Safety Review Board;
- j. Review of the Emergency Plan and submittal of recommended changes to the Corporate Nuclear Safety Review Board;
- k. Review of any accidental, unplanned, or uncontrolled radioactive release including the preparation of reports covering evaluation, recommendations, and disposition of the corrective action to prevent recurrence and the forwarding of these reports to the Chief Nuclear Officer and to the Corporate Nuclear Safety Review Board; and
- l. Review of changes to the PROCESS CONTROL PROGRAM and the OFFSITE DOSE CALCULATION MANUAL.

2.1.7 The POC shall:

- a. Recommend in writing to the Plant General Manager approval or disapproval of items considered under Appendix III, 2.1.6a. through d. prior to their implementation.
- b. Render determinations in writing with regard to whether or not each item considered under Appendix III, 2.1.6a. through e. constitutes an unreviewed safety question as defined in 10 CFR 50.59.
- c. Provide written notification within 24 hours to the Chief Nuclear Officer and the Corporate Nuclear Safety Review Board of disagreement between the POC and the Plant General Manager; however, the Plant General Manager shall have responsibility for resolution of such disagreements pursuant to Technical Specification 5.1.1.

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- 2.1.8 The POC shall maintain written minutes of each POC meeting that, at a minimum, document the results of all POC activities performed under the responsibility provisions of these Specifications. Copies shall be provided to the Chief Nuclear Officer and the Corporate Nuclear Safety Review Board.

## 2.2 CORPORATE NUCLEAR SAFETY REVIEW BOARD (CNSRB)

- 2.2.1 The CNSRB shall function to provide independent review and audit of designated activities in the areas of:

- a. Nuclear power plant operations,
- b. Nuclear engineering,
- c. Chemistry and radiochemistry,
- d. Metallurgy,
- e. Instrumentation and control,
- f. Radiological safety,
- g. Mechanical and electrical engineering, and
- h. Quality Assurance practices.

The CNSRB shall report to and advise the Chief Nuclear Officer on those areas of responsibility in Appendix III, 2.2.7 and 2.2.8.

- 2.2.2 The CNSRB shall be composed of at least nine and no more than twelve members, appointed in writing by the Chief Nuclear Officer from his senior technical staff and/or from outside Energy Northwest. He shall designate from the members a Chairman and an Alternate Chairman. The qualifications of all members shall meet the minimum requirements of Section 4.7 of ANSI/ANS 3.1-1981 and have, cumulatively, expertise in the areas listed in Appendix III, 2.2.1, as a minimum.
- 2.2.3 All alternate members shall be appointed in writing by the CNSRB Chairman to serve on a temporary basis; however, no more than two alternates shall participate as voting members in CNSRB activities at any one time.
- 2.2.4 Consultants shall be utilized as determined by the CNSRB Committee to provide expert advice to the CNSRB.

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- 2.2.5 The CNSRB shall meet at least once per calendar quarter during the initial year of unit operation following fuel loading and at least once per 6 months thereafter.
- 2.2.6 The quorum of the CNSRB necessary for the performance of the CNSRB review and audit functions of these specifications shall consist of the Chairman or the alternate Chairman and at least four CNSRB members including alternates. The quorum shall consist of not less than the majority of the members, or duly appointed alternates. No more than a minority of the quorum shall have line responsibility for operation of the unit.
- 2.2.7 The CNSRB shall review:
- a. The safety evaluations for (1) changes to procedures, equipment or systems and (2) tests or experiments completed under the provision of 10 CFR 50.59 to verify that such actions did not constitute an unreviewed safety question;
  - b. Proposed changes to procedures, equipment, or systems which involve an unreviewed safety question as defined in 10 CFR 50.59;
  - c. Proposed tests or experiments which involve an unreviewed safety question as defined in 10 CFR 50.59;
  - d. Proposed changes to Technical Specifications or the Operating License;
  - e. Violations of codes, regulations, orders, Technical Specifications, license requirements, or of internal procedures or instruction having nuclear safety significance;
  - f. Significant operating abnormalities or deviations from normal and expected performance of unit equipment that affect nuclear safety;
  - g. All REPORTABLE EVENTS, as specified in 10 CFR 50.73;
  - h. All recognized indications of an unanticipated deficiency in some aspect of design or operation of structures, systems, or components that could affect nuclear safety; and
  - i. Reports and meeting minutes of the POC.
  - j. Audit reports and summary reports of audits.

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- 2.2.8 Program reviews and audits of unit activities shall be performed under the cognizance of the CNSRB. Audit schedules assure that the following areas are audited at indicated frequencies or more frequently as performance dictates.
- a. The conformance of unit operation to provisions contained within the Technical Specifications and applicable license conditions at least once per 24 months.
  - b. The performance, training and qualifications of the entire unit staff at least once per 24 months.
  - c. The results of actions taken to correct deficiencies occurring in unit equipment, structures, systems, or method of operation that affect nuclear safety, at least once per 24 months.
  - d. The performance of activities required by the Operational Quality Assurance Program to meet the criteria of Appendix B, 10 CFR Part 50, at least once per 24 months.
  - e. The fire protection programmatic controls including the implementing procedures at least once per 24 months by qualified licensee QA personnel.
  - f. Each element of the Emergency Plan and implementing procedures as defined by 10 CFR 50.54(t).
  - g. Each element of the Security Plan and implementing procedures as defined by 10 CFR 50.54(p) and 10 CFR 73.55.
  - h. The fire protection equipment and program implementation, at least once per 12 months using either a qualified offsite licensee fire protection engineer(s) or an outside independent fire protection consultant. An outside independent fire protection consultant shall be used at least once every third year.
  - i. Any other area of unit operation considered appropriate by the CNSRB or the Chief Nuclear Officer.
  - j. The radiological environmental monitoring program and the results thereof at least once per 24 months.

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- k. The OFFSITE DOSE CALCULATION MANUAL and implementing procedures at least once per 24 months.
- l. The PROCESS CONTROL PROGRAM and implementing procedures for processing and packaging of radioactive wastes at least once per 24 months.
- m. The performance of activities required by the Quality Assurance Program for effluent and environmental monitoring at least once per 24 months.

2.2.9 Records of CNSRB activities shall be prepared, approved, and distributed as indicated below:

- a. Items identified at each CNSRB meeting that require actions shall be identified and tracked. These actions shall be resolved in a time frame commensurate with their importance to safety.
- b. Minutes of each CNSRB meeting shall be prepared, approved, and forwarded to the Chief Nuclear Officer within 15 working days following each meeting.
- c. Reports of reviews encompassed by Appendix III, 2.2.7 above, shall be prepared, approved, and forwarded to the Chief Executive Officer within 15 working days following completion of the review.
- d. Audit reports encompassed by Appendix III, 2.2.8 shall be forwarded to the Chief Nuclear Officer and to the management positions responsible for the areas audited within 30 days after completion of the audit.

### 3.0 PROCEDURES AND PROGRAMS

- 3.1 Each procedure of Technical Specification 5.4.1, and changes thereto, shall be reviewed and approved as specified by Appendix III, 4.0, prior to implementation and reviewed periodically as set forth in administrative procedures.
- 3.2 Temporary changes to procedures of Technical Specification 5.4.1a. through e. may be made provided:
  - a. The intent of the original procedure is not altered.

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- b. The change is approved by two members of the unit management staff, at least one of these individuals shall be the supervisor in charge of the shift and holds a Senior Operator license on the unit affected.
- c. The change is documented and reviewed by the appropriate member(s) of Plant management within 14 days of implementation.

#### 4.0 REVIEW AND APPROVAL OF PROGRAMS AND PROCEDURES

- 4.1 The procedure review and approval process shall be controlled and implemented by administrative procedure(s).
- 4.2 Each program and procedure required by Technical Specification 5.4 and other procedures that affect nuclear safety, and changes thereto, shall be reviewed by a minimum of two technical reviewers; i.e., the procedure sponsor and a Qualified Procedure Reviewer who are knowledgeable in the affected functional area. The Qualified Procedure Reviewer shall not be the individual who prepared the procedure or procedure change. The Qualified Procedure Reviewer, or procedure sponsor shall determine the need for cross-disciplinary reviews. All required cross-disciplinary reviews of new procedures, procedure revisions or changes thereto shall be completed prior to approval.
- 4.3 Qualified Procedure Reviewer(s) shall meet or exceed the qualifications described in Section 4 of ANSI N18.1-1971 for applicable positions, with the exclusion of the positions identified in Section 4.3.1 and 4.5. Individuals whose positions are described in Section 4.3.1 and 4.5 may qualify as qualified procedure reviewers provided they meet the qualification described in other portions of Section 4.
- 4.4 Each program and procedure required by Technical Specification 5.4 and other procedures that affect nuclear safety, and changes thereto, shall be reviewed to determine if a 10 CFR 50.59 Safety Evaluation is required. This review shall be accomplished by two individuals, who are knowledgeable in the affected functional area. These individuals shall meet or exceed the qualifications described in Section 4 of ANSI N18.1-1971 for the applicable positions. Safety evaluations, when required, shall be reviewed by POC per OQAPD, Appendix III, 2.1.6.a.
- 4.5 Nuclear safety related procedures and procedure changes shall be reviewed and approved, prior to implementation, by the appropriate member(s) of management, as determined by the Plant General Manager and as specified in Administrative Control Procedures.

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- 4.6 All changes to the Process Control Program (PCP) and the Offsite Dose Calculation Manual (ODCM) shall be reviewed by POC and approved by the Plant General Manager prior to implementation.

## 5.0 RECORD RETENTION

A Records Disposition Program was established to manage the identification, retention, retirement and disposal of Energy Northwest records and documents. Refer to the Records Disposition Program to ensure compliance with various Federal and Washington State record retention requirements.

- 5.1 In addition to the applicable record retention requirements of Title 10, Code of Federal Regulations, the following records shall be retained for at least the minimum period indicated.
- 5.2 The following records shall be retained for at least 5 years:
- a. Records and logs of unit operation covering time interval at each power level.
  - b. Records and logs of principal maintenance activities, inspections, repair, and replacement of principal items of equipment related to nuclear safety.
  - c. ALL REPORTABLE OCCURRENCES submitted to the Commission.
  - d. Records of surveillance activities, inspections, and calibrations required by the Plant Technical Specifications.
  - e. Records of changes made to the procedures required by Technical Specification 5.4.1.
  - f. Records of radioactive shipments.
  - g. Records of sealed source and fission detector leak tests and results.
  - h. Records of annual physical inventory of all sealed source material of record.
- 5.3 The following records shall be retained for the duration of the unit Operating License:
- a. Records and drawing changes reflecting unit design modifications made to systems and equipment described in the Final Safety Analysis Report (FSAR).

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- b. Records of new and irradiated fuel inventory, fuel transfers, and assembly burnup histories.
- c. Records of radiation exposure for all individuals entering radiation control areas.
- d. Records of gaseous and liquid radioactive material released to the environs.
- e. Records of transient or operational cycles for those unit components identified in Technical Specification 5.5.5.
- f. Records of reactor tests and experiments.
- g. Records of training and qualification for current members of the unit staff.
- h. Records of inservice inspections performed pursuant to the Technical Specifications.
- i. Records of quality assurance activities required by the Operational Quality Assurance Manual not listed in Appendix III, 5.2.
- j. Records of reviews performed for changes made to procedures or equipment or reviews of tests and experiments pursuant to 10 CFR 50.59.
- k. Records of meetings of the POC and the CNSRB.
- l. Records of the service lives of all hydraulic and mechanical snubbers required by WNP-2 Snubber Program including the date at which the service life commences and associated installation and maintenance records.
- m. Records of analysis required by the radiological environmental monitoring program that would permit evaluation of the accuracy of the analysis at a later date. This should include procedures effective at specified times and QA records showing that these procedures were followed.
- n. Records of reviews performed for changes made to the OFFSITE DOSE CALCULATION MANUAL and the PROCESS CONTROL PROGRAM.

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## 6.0 OPERATING EXPERIENCE

(TMI ITEM I.C.5)

- 6.1 An Operating Experience (OE) Program is established and the program procedure describes how industry-operating experience is identified, reviewed, evaluated, and documented. The industry operating experience information includes, but is not limited to, NRC Bulletins and Notices, INPO Significant Operating Experience Reports, Significant Event Reports, Significant Event Notifications and vendor information, such as GE Service Information Letters.
- 6.2 The Operating Experience program administrator will perform the initial document review. The information that is applicable to WNP-2 will be identified, evaluated and documented in accordance with the approved procedure. The operating experience information will be evaluated by the applicable knowledgeable organization. To prevent conflicting or contradictory information being conveyed to plant personnel, industry information processed via the Operating Experience Program is evaluated prior to use in the training program.
- 6.3 Internal Operating Experience information identified via the Corrective Action Program will be evaluated for transmittal to the industry.
- 6.4 Independent periodic evaluations of the Operating Experience review process will be performed by the Quality Organization.

## **OPERATIONAL QUALITY ASSURANCE PROGRAM DESCRIPTION (OQAPD) REVISION 32, SUMMARY OF CHANGES**

All Sections and Appendix's have been changed to replace the company name and logo from Supply System to Energy Northwest.

### **SECTION 1 – ORGANIZATION**

Section 1 is a complete revision. Specific organizational position titles have been replaced with generic titles and position functions. For example, Paragraph 1.1.2.b. 1) discusses the executive responsible for plant nuclear safety and efficient operation of WNP-2. The specific title for this position is the Vice President, Generation. Paragraph 1.1.2.b. 2) discusses the executive responsible for operations support. The specific title for this position is the Vice President, Operation Support/PIO. Paragraph 1.1.2.c. 1) discusses the manager responsible for quality assurance. The specific title for this position is the Quality, Manager. Paragraph 1.1.2.c. 2) discusses the manager responsible for overall plant operations. The specific title for this position is the Plant General Manager. Functional responsibilities for key Energy Northwest personnel are described in Chapter 13 of the Final Safety Analysis Report for WNP-2 and Site Wide Procedure SWP-ORG-01.

Paragraph 1.1.1 Methodology was added to provide general requirements that were not covered in previous revisions to the OQAPD. These are not new commitments or requirements. They are requirements that were covered in other Licensed Bases Documents.

### **SECTION 2 – QUALITY ASSURANCE (QA) PROGRAM**

An editorial change was made clarify Paragraph 2.2.1.

Paragraph 2.3.1 was added to clarify Energy Northwest's commitment to Regulatory Guides not covered by previous revisions to the OQAPD.

An editorial change was made to Paragraph 2.2.6 to change specific position titles to generic position titles.

### **SECTION 12 – CONTROL OF MEASURING AND TEST EQUIPMENT**

Paragraph 12 was modified to clarify the types of items that do not require calibration and control by this section of the OQAPD.

## SECTION 18 – AUDITS

Paragraph 18.2.1 was modified to clarify the commitment for scheduling external audits.

Paragraph 18.2.7 was clarified by changing the word deficiencies to adverse audit findings.

## APPENDIX I – QUALIFICATION REQUIREMENTS

Specific position titles were removed and replaced with the requirements applying to key Quality Assurance personnel. The experience requirement of two years for the manager in implementation of the quality assurance program was defined. The definition was based on the 1987 revision to ANSI/ANS-3.1, which defines how the experience time requirement can be met. The 1978 revision does not provide a definition.

## APPENDIX II – POSITION STATEMENTS

Position Statement II.5 for Regulatory Guide 1.33, Position C.4 was added. This adds a clarification to the specified audit frequencies. This is to align the Position Statement with Appendix III, Paragraph 2.2.8.

## APPENDIX III – ADDITIONAL QUALITY PROGRAM REQUIREMENTS

Paragraph 2.2.8 was modified to state that audit schedules assure that the following areas are audited at indicated frequencies or more frequently as performance indicates. The audits listed in Paragraphs 2.2.8. a, b, c, j, and m. were changed to a frequency of at least once per 24 months. The audit frequencies specified in Paragraphs 2.2.8. f. and g. were changed to reference the 10 CFR section that corresponds to the activity. The referenced 10 CFR section specifies a frequency based on specific criteria rather than a specific time frequency.